



PIMA COUNTY PUBLIC LIBRARY

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www.library.pima.gov

Tom Wheeler
Chairman, Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

3 July 2014

Dear Mr. Chairman and Commissioners:

I have been asked two questions:

- 1) How much did it cost the Pima County Public Library – with a main library and 26 branches – to provide wireline and wireless Internet access to our patrons?
- 2) What is our view about using square footage of buildings to limit the amount of money a public library to obtain from the FCC through the E-Rate program?

The answer to the first question is approximately \$2.25 million to \$3.2 million over five years. We have spent or plan to spend about \$2.25 million from 2009 through 2014 on routers, switches, power management, wireless controllers, wireless access points, firewalls, internal cabling, installation, software, and licenses. These costs reflect discounts ranging from 40% to 70% on equipment and using our own personnel for all of the installations and support. We also expect that maintenance and service fees will add at least another \$770,000 in additional expenses over the next five years.

The answer to the second question is that using square footage is unfair to urban libraries, and to our patrons who are disproportionately low-income, unemployed, or underemployed. Pima County Public Library serves a population of nearly 1 million people 80% of whom live in the urban Tucson metropolitan area. Our libraries total approximately 375,000 square feet; thus, the cost over five years of delivering access to digital information is between \$4 and \$5 per square foot. In general, urban libraries are more crowded and serve many more patrons in smaller spaces than our suburban or rural counterparts. Moreover, using square footage ignores most factors relevant to wireless performance.

I would agree that square footage is going to be a measure that would make the playing field much more manageable for the program. A more realistic number based on real numbers at the time the new act is approved would really make sure all libraries are funded from an equitable standpoint.

We are investing at this level because wireless is essential for our patrons. Increasingly, many users bring their own devices to our buildings for downloading our material, engaging in employment-related activities, researching medical concerns, participating in educational and training sessions, and doing their course work. In addition, many public libraries, including our own, are ourselves using and providing more and more wireless devices for use by our patrons to meet the demands of an increasingly mobile technology landscape.

If the FCC allocates money to libraries on a per square footage basis it will send much more money to capacious, uncrowded suburban libraries and less money available for smaller, crowded urban libraries whose patrons often have no other practical way to obtain access to the Internet for seeking employment, education, or participation in society.

Wireless costs are not merely a function of the square footage of a room with wireless connectivity. Wireless performance is a function of users, interference from adjacent networks in other buildings, and architectural impediments. A room of a certain size with many users will have poorer wireless service than the same room with the same network that has fewer users. Resolving these capacity and technology problems requires a larger expenditure for expanding a wireless infrastructure.

I cannot emphasize enough the importance of using current square footage data. Libraries have not reported their square footages with the knowledge that funding would be specifically tied to it. Any reported square footage number the FCC is using may be off by a pretty big margin.....understated or overstated. For example: Pima County Public Library has plans to add nearly 60,000 square feet of new and expanded library space over the next five years that has not yet been reported anywhere. Allow public libraries to provide square footage data at the time of application assuring all libraries are funded from an equitable standpoint.

If you asked me how the FCC should fund digital access for libraries, I would say there are two viable alternative methods and libraries should be allowed to choose the method that benefits them more:

1. Fund public libraries at the rate of no less than \$4 per square foot;
2. Fund public libraries at the rate of \$150 per average daily visitor.

Give libraries the money we need to deliver what is typically the only free public Internet access available in the social landscape. Of course, develop program rules to help or require libraries to have efficient procurement processes and clear program guidelines that will enable all libraries to participate in available E-rate program opportunities.

We are happy to share our practices and outcomes with anyone.

Sincerely,

A handwritten signature in black ink that reads "Melinda S. Cervantes". The script is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Melinda S. Cervantes
Executive Director